

AMENDMENT UNDER 37 C.F.R. § 1.114(c)
U.S. APPLICATION NO. 09/939,691
ATTORNEY DOCKET NO. Q65842

REMARKS

Claims 1-4, 6, 7, and 11-17 have been examined on their merits.

Applicants herein add new claims 18 and 19.

Claims 1-4, 6, 7 and 11-19 are all the claims presently pending in the application.

1. Claims 1-4, 6, 7 and 11-17 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable by Ofek (U.S. Patent No. 6,259,695) in view of Mayes *et al.* (U.S. Patent No. 5,793,763). Applicants traverse the § 103(a) rejection of claims 1-4, 6, 7 and 11-17, and insofar as the rejection might apply to new claims 18 and 19, for at least the reasons discussed below

With respect to claim 1, the combination of Ofek and Mayes *et al.* fails to teach or suggest at least first and second communication means for replacing fixed IP addresses in data packets exchanged between Real Time Data over IP hosts with dynamic IP addresses to conceal the fixed IP addresses, and exchanging the dynamic IP addresses, as recited in claim 1. At best, the combination of Ofek and Mayes *et al.* discloses the conversion of a fixed IP address into a dynamic IP address in one direction only. *See, e.g.,* Figure 2 and col. 4, line 55 to col. 5, line 29 of Mayes *et al.* There is no disclosure in the combination of Ofek and Mayes *et al.* of the conversion and exchange of dynamic IP addresses between two communication means that are respectively connected to two IP hosts. Thus, Applicants submit that the Patent Office cannot fulfill the “all limitations” prong of a *prima facie* case of obviousness, as required by *In re Vaeck*.

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Applicants submit that one of skill in the art would not be motivated to combine the two references. Both Ofek and Mayes *et al.* lack any teaching or suggestion about the desirability of replacing the fixed IP addresses in data packets exchanged between two IP hosts with dynamic IP addresses, and exchanging the dynamic IP addresses between communications means coupled to the IP hosts. Applicants submit that the Patent Office cannot fulfill the motivation prong of a *prima facie* case of obviousness, as required by *In re Dembicza*k and *In re Zurko*.

Based on the foregoing reasons, Applicants submit that the combination of Ofek and Mayes *et al.* fails to teach or suggest all of the claimed elements as arranged in claim 1. Thus, Applicants submit that claim 1 is allowable, and further submit that claims 2-4, 6, 7 and new claim 18 are allowable as well, at least by virtue of their dependency from claim 1. Applicants respectfully request that the Patent Office reconsider and withdraw the § 103(a) rejection of claims 1-4, 6 and 7.

With respect to independent claim 11, Applicants submit that claim 11 is allowable for at least reasons analogous to those discussed above with respect to claim 1. Applicants submit that claim 11 is allowable, and respectfully request that the Patent Office reconsider and withdraw the § 103(a) rejection of claim 11.

With respect to independent claim 12, Applicants submit that claim 12 is allowable for at least reasons analogous to those discussed above with respect to claim 1. Applicants submit that claim 12 is allowable, and further submit that claims 13-17 and new claim 19 are allowable as well, at least by virtue of their dependency from claim 12. Applicants request that the Patent Office reconsider and withdraw the § 103(a) rejection of claims 12-17.

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In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

 *Kelly G. Hyndman*
Reg. No. 39,234
Paul J. Wilson
Registration No. 45,879

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

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